

**AFFIDAVIT OF FBI TASK FORCE OFFICER RICHARD C. LAFT, JR.
IN SUPPORT OF AN APPLICATION FOR A CRIMINAL COMPLAINT**

I, Richard C. Laft, Jr., duly sworn, depose and state:

Introduction and Agent Background

1. I am a Detective in the Chelsea Police Department Criminal Investigation Division, currently assigned to the Joint Terrorism Task Force (“JTTF”) for the Federal Bureau of Investigation, Boston Division. I have been a police officer for approximately 14 years, the last six of which have been as a detective. In addition to my police academy training and the annual in-service training which I attend, I have completed numerous specialized training courses in criminal investigation. Since being assigned to the JTTF in October 2018, I have been working on national security investigations in my capacity as a JTTF task force officer and have received training in, among other things, international and domestic terrorism investigations. I also possess a bachelor’s degree in criminal justice. Over my 14 years working in law enforcement, I have participated in both criminal and national security investigations.

2. I submit this affidavit in support of a criminal complaint charging Matthew HAVILAND with cyberstalking, in violation of 18 U.S.C. § 2261A(2), and transmitting a threat in interstate commerce, in violation of 18 U.S.C. § 875(c) (collectively, the “Target Offenses”). As further described below, there is probable cause to believe, and I do in fact believe, that on or about March 10, 2019, between approximately 4:01 p.m. and 7:28 p.m. Eastern Standard Time, HAVILAND sent approximately 28 e-mails to Victim 1, a professor in Massachusetts. Several of those e-mails contained direct threats (*e.g.*, “I will rip every limb from your body and eat it, piece by piece” and “I will bite through your eyeballs while you’re still alive, and I will laugh while you scream”), and many others contained related violent sentiments (*e.g.*, “You deserve to literally be ripped apart while you scream in horror” and “I will torture you relentlessly until the

end of time”). Further, a number of HAVILAND’s e-mails also referred to abortion and appeared to associate abortion with the violence he wished upon Victim 1 (*e.g.*, “You deserve to have your legs torn off like all those fucking babies” and “[Y]ou will know pain as our babies have known it for forty years”). Then, over the span of less than two hours on or about March 15, 2019, HAVILAND sent approximately 11 similar e-mails to the admissions department of one of the professional schools at the university where Victim 1 works. Those messages included, “You should be Murdered in cold blood” and “You people are Evil, *putrid*, and somebody should [sic] BOMB your school for spreading the idea that it’s okay to HATE people because of their race.” Consequently, I have probable cause to believe, and do in fact believe, that HAVILAND committed the Target Offenses.

3. The facts in this affidavit come from my personal observations and review of records, my training and experience, and information obtained from other agents and witnesses. Because this affidavit is submitted for the sole purpose of seeking the issuance of a criminal complaint, it does not include every fact known to me concerning this investigation.

Summary of the Applicable Laws and Regulations

4. Section 2261A(2), Title 18, United States Code, makes it illegal to engage in cyberstalking as defined by that statute. Section 2261A states:

Whoever –

- (1) travels in interstate or foreign commerce or is present within the special maritime and territorial jurisdiction of the United States, or enters or leaves Indian country, with the intent to kill, injure, harass, intimidate, or place under surveillance with intent to kill, injure, harass, or intimidate another person, and in the course of, or as a result of, such travel or presence engages in conduct that –
 - (A) places that person in reasonable fear of the death of, or serious bodily injury to –

- (i) that person;
 - (ii) an immediate family member (as defined in section 115) of that person; or
 - (iii) a spouse or intimate partner of that person; or
 - (B) causes, attempts to cause, or would be reasonably expected to cause substantial emotional distress to a person described in clause (i), (ii), or (iii) of subparagraph (A); or
- (2) with the intent to kill, injure, harass, intimidate, or place under surveillance with intent to kill, injure, harass, or intimidate another person, uses the mail, any interactive computer service or electronic communication service or electronic communication system of interstate commerce, or any other facility of interstate or foreign commerce to engage in a course of conduct that –
- (A) places that person in reasonable fear of the death of or serious bodily injury to a person described in clause (i), (ii), or (iii) of paragraph (1)(A); or
 - (B) causes, attempts to cause, or would be reasonably expected to cause substantial emotional distress to a person described in clause (i), (ii), or (iii) of paragraph (1)(A),

shall be punished as provided in section 2261(b) of this title.

Section 2261, for its part, states that violations of § 2261A are punishable by a fine, imprisonment for up to five years (or more, if injury or death results), or both.

5. Title 18, United States Code, Section 875(c) makes it illegal to transmit in interstate or foreign commerce any communication containing any threat to kidnap any person or any threat to injure the person of another. Section 875(c) states:

Whoever transmits in interstate or foreign commerce any communication containing any threat to kidnap any person or any threat to injure the person of another, shall be fined under this title or imprisoned not more than five years, or both.

Probable Cause to Believe HAVILAND Committed the Target Offenses

HAVILAND and Victim 1

6. HAVILAND is a thirty-year old male who resides in Kingstown, Rhode Island. HAVILAND attended college in Boston, Massachusetts, from approximately 2008 through 2012. According to one witness who reports having known and been friends with HAVILAND for approximately eleven years (“Individual 1”), within the last year, HAVILAND’s views regarding abortion and politics have become more extreme. Individual 1 believes this is at least in part because of the way the news media portrays President Trump. Individual 1 reported that he/she has been living in fear because of HAVILAND’s violent social media posts and text messages. Individual 1 is concerned that HAVILAND may find and hurt Individual 1 and/or Individual 1’s family. According to Individual 1, HAVILAND’s e-mail address is [REDACTED] (“HAVILAND’s E-mail Account”) and his phone number is [REDACTED] 1383.

7. According to [REDACTED] subscriber records for HAVILAND’s E-mail Account, the name associated with the account is “matthewyesitis Haviland” and [REDACTED] 1383 is the registered phone number for the account. The alternate e-mail for the account is [REDACTED].¹

Based on this information, and on the content of communications described below, I believe HAVILAND is the user of HAVILAND’s E-mail Account.

8. Victim 1 is a resident of Massachusetts whose office and professorship are both in Massachusetts. Victim 1 has published and spoken in favor of abortion rights. Victim 1 has also

¹ An alternate e-mail address is an additional e-mail address a Google account holder can use to sign into his or her Google Account.

published highly critical views regarding President Trump. Victim 1's university e-mail address is published on Victim 1's university homepage.

HAVILAND's March 10, 2019 E-mails to Victim 1

9. On or about March 10, 2019, Victim 1's university e-mail account received approximately 28 e-mails from HAVILAND's E-mail Account. Those e-mails, which were accessed in Massachusetts, are listed below in chronological order based on the approximate time at which they were received by Victim 1:

Approximate Time Received	Content
4:01 p.m.	<p>So this is how it is now. You get to make any wicked allegations, calling them evil, calling them deeply corrupt, with no evidence, and in your very allegations asking for people to come forth with evidence to support what you say, and you are the right one, right? I think you are the evil, I think you are the person, along with all your Leftist brethren, trying to destroy this country by being able to take down someone without any evidence ever.</p> <p>You call yourself a [REDACTED] professor?</p> <p>Matt</p>
4:04 p.m.	<p>How about, for example, killing babies? How about this witchhunt society where everyone gets burned at the stake before even asking for evidence, much less getting it.</p> <p>You are the evil and it goes right down to killing babies, I don't have to make something up or wait for evidence. You guys literally fight for killing babies, and I am fighting against your ideas and your practices, and you are fighting against a ghost you invented of us.</p>
4:05 p.m.	Fight against ideas, how 'bout that
5:18 p.m.	<p>You who try to shut people up based on race, you who take a president who's taking our country in a place of more freedom rather than less, you who would brutally murder a child after they were born (or before they were born).</p> <p>You are Evil. Pure evil—all Democrats must be eradicated, like the Confederates before them and among their ranks. They must be slaughtered.</p>

Approximate Time Received	Content
5:19 p.m.	*who would *who would
5:19 p.m.	*to a place
5:24 p.m.	You deserve to have your legs torn off like all those fucking babies
5:25 p.m.	And then have people march in the streets laughing at your distraction while they wear pink fucking hats. And then they should all be slaughtered to, because they're evil as well
5:26 p.m.	* destruction ²
5:27 p.m.	You are a Nightmare. You are Josef Stalin. You deserve to be ambushed in a hallway and raped until your asshole bleeds
5:27 p.m.	You deserve to have your innards ripped from your body and savored over the flesh of all Abortion doctors
5:57 p.m.	You who would actively try to destroy our Liberty in the name of Fighting Fascism. You are the worst person in the world, just like every other baby-killing fucking Democrat
5:57 p.m.	*name of You deserve to have your cock skinned
6:02 p.m.	You will be held accountable for every fucking baby you murdered through your horrible deception of they are not humans.
6:02 p.m.	You will have your face ripped off and eaten by me, personally. I will enjoy raping your body after you're dead. And that will only be the start.

² I understand the use of the asterisk in this message and others quoted in this affidavit to indicate a message meant to correct an error in an earlier message. In this instance, for example, I interpret the 5:26 p.m. message “* destruction” to mean that the 5:25 p.m. message was intended to read “. . . laughing at your destruction,” not “. . . laughing at your distraction,” as originally written.

Approximate Time Received	Content
6:03 p.m.	I will rip every limb from your body and eat it, piece by piece. I will kill every member of your family and make them feel like every aborted baby that you have ever put under the threshers.
6:05 p.m.	I will kill every Democrat in the world so we never more have to have our babies brutally murdered by you absolute terrorists. I will enjoy ripping the skin from your bodies piece by piece while you scream in agony.
6:06 p.m.	*piece by piece
6:06 p.m.	And you will know pain as our babies have known it for forty years. You are a terrorist, and you deserve to have your body died and mutilated.
6:08 p.m.	You deserve to literally be ripped apart while you scream in horror
6:09 p.m.	* be literally
6:12 p.m.	I want you to undergo endless Agony until you're dead
7:12 p.m.	I will bite through your eyeballs while you're still alive, and I will laugh while you scream
7:13 p.m.	I will torture you relentlessly until the end of time.
7:13 p.m.	I will feed your body to the pigs again and again until you have died 1000 times and I will start raping you while I do it
7:14 p.m.	*and then I will
7:14 p.m.	And you will suffer, Oh you will suffer And I will enjoy your screams like fine wine while I pet myself
7:28 p.m.	I will eat your Fucking Face off and throat in the garbage

10. In an interview with me, Victim 1 reported being very concerned about the e-mails listed above. Victim 1 stated that he/she expects some hate mail and has a very high tolerance for it, but is very fearful for himself/herself and his/her family as a result of the March 10 e-mails from HAVILAND's E-mail Account. Victim 1 fears that the sender of the

e-mails may act upon the threats. Victim 1's assistant, whose desk is outside Victim 1's office and who has access to and routinely reads Victim 1's university e-mails, also reported being worried for his/her safety because of the threats.

HAVILAND's March 15 and 16, 2019 E-mails to the Professional School

11. In addition to the e-mails quoted above, between approximately 6:16 p.m. on March 15, 2019 and 3:10 a.m. on March 16, 2019, the admissions office for a professional school at the university where Victim 1 is a professor (the "Professional School") received approximately 12 e-mails from HAVILAND's E-mail Account. Those e-mails read as follows:

Approximate Time Received	Content
10:10 p.m. (March 15)	<p>Hello,</p> <p>I thought I was going to see something refreshing, seeing [REDACTED] as a topic of debate or discussion within the [REDACTED] University admissions platform. Instead, I find that you guys instead of criticizing the brand of feminism that is taking over the West and castigating man as evil outlaws in society who should shut themselves up forever and never be understood or heard again, I see that you think the bad part of feminism is that involves <i>white</i> people?</p> <p>"[REDACTED]"</p> <p>(By the way, "cisgender" as an insult means we should be ashamed of the genders we are <i>born with</i>. You are evil—you're not progressive, you are evil.)</p> <p>You are evil, you are just evil, and this is more racism from the evil radical feminists an intersectionality people, and don't forget that intersection Audi is the ultimate evolution of racism, classism, and gender warfare, judging everyone not by their character but taking every other possible metric and judging people by <i>that</i>.</p> <p>You should be ashamed of yourselves.</p> <p>Matt</p>

Approximate Time Received	Content
10:11 p.m.	*gender Sent from my iPhone
10:12 p.m.	*intersectionality An evil <i>disease</i> of a Movement
10:16 p.m.	And here's the link, and email. Thank you for reading, this will be my 1st message, but these people don't want <i>equality</i> . [hyperlink redacted]
10:21 p.m.	Oh, I'm sorry, I was sending that email to someone from The Washington Post as an example of the constant abuse I get, to the fucking day , for being a white person. Fuck you, my existence is not a blight on society. Yours is, for pushing the idea that if you are able-bodied or white or okay WITH THE FUCKING GENDER YOU WERE BORN WITH, you are a bad person. You people are Evil, <i>putrid</i> , and somebody should [sic] BOMB your school for spreading the idea that it's okay to HATE people because of their race.
10:26 p.m.	Thank You.
10:27 p.m.	You are Horrible.
10:28 p.m.	You should be Murdered in cold blood.
10:41 p.m.	Fuck You
11:34 p.m.	We're in a war, do you get that? It's another Civil War, as people who don't care about skin color versus you people who will demonize people for their color, for their ability to even fucking walk, for their gender.
11:52 p.m.	*us people who
3:10 a.m. (March 16)	I'm sorry, you should not be BOMBed You should not be murdered, but you *must* come to your senses

12. Based on the facts collected during this investigation, I believe that HAVILAND

was the author and sender of the e-mails sent to Victim 1 on March 10 and to the Professional School on March 15 and 16.

Other Recent Threatening and Harassing Communications by HAVILAND

13. Between approximately 8:00 p.m. on April 4 and 3:00 a.m. on April 5, 2019, a woman's medical center in Rhode Island that is advertised as an abortion clinic received approximately 114 voice messages from a male caller who, among other things, spoke of babies being murdered and drew comparison between Nazis and a doctor who worked at the clinic. In a phone interview with law enforcement on or about April 8, 2019, HAVILAND admitted he had placed the calls and apologized, stating that he had no intent to harm anyone. HAVILAND stated that he found the number for the clinic online and called to vent his beliefs against abortion.

14. Based on my training and experience, I know that there are extremists on both sides of the abortion debate. I further know that anti-abortion extremists at times justify the use of force as morally necessary. Although most anti-abortion extremists are not violent, some have caused injury or death to healthcare providers, economic harm to reproductive health care facilities, and the intimidation of staff and patients at those facilities.

15. Law enforcement has also obtained copies of text messages that, according to Individual 1, were sent by HAVILAND to a mutual friend ("Individual 2"). In the messages, which I have reviewed, HAVILAND draws extensive comparison between abortion and slavery (*e.g.*, "[If] you ever talk about Abortion as if it's a woman's right, you are making the same argument as a slave master who says that he paid for his slaves") and calls abortion "a woman's holocaust, of babies." Among HAVILAND's text messages were the following statements:

. . . We need Civil War, for this and Others.

Because you don't get to debate Slavery, and you don't get to debate Abortion. You just get Killed, someday, by the Good guys.

You don't get to Debate the Holocaust, and we will kill you there, too. We did. And if you guys stopped making horrible travesties of human murder, maybe we would have to stop killing you. Enjoy the Confederates while it lasts

Because it will, go down. And I'll be on the front lines Fighting you guys to stop this Endless murder of babies. Woman's rights? Yeah, right. It's a Travesty. It's an Evil. And you guys will keep pushing it until you Stop or we kill you. Literally.

Yeah

I'm beyond caring how I Sound. I was beyond that a long time ago. Now it's time for Justice, and if you don't wake You up, We will.

It never was a Woman's rights issue. It's literally killing babies. That's All it is, and We want you to stop it.

Or we will kill you to do it.

It's that Serious. It's not a Joke. . . .

16. In addition to these communications, I believe HAVILAND is also responsible for a number of recent violent and threatening posts on the website Medium.com, an online publishing platform on which users can post article-length writings on various topics.

17. On or about May 7, 2018, a Medium user posted an article criticizing a political candidate who endorsed legislation that would impose criminal liability on women who obtained abortions. In the comments section of that article are four comments date-stamped "Mar 29" posted by a Medium user with the user name "matthewyesitis Haviland," whose profile picture depicts a male I believe to be HAVILAND. Based on the date stamp, which did not include a year, I believe the posts were made on or about March 29, 2019—within a few weeks of the e-mails to Victim 1 and the Professional School, and several days before HAVILAND's phone calls to the women's health clinic.

18. The first three of March 29, 2019 comments read as follows (with asterisks here

designating breaks between comments):

Fuck you. It *amazes* me, amazes me how pro-abortion activists or just people who like abortion take the moral high ground.

You're literally ripping babies physically apart in the Womb, and you take the moral high ground? "It's a woman's choice." **Fuck you.**

* * *

You guys would *squirm* if whatever happened during Abortion *ever* happened to an Abortion doctor. You guys are so evil and so brainwashed, I would kill every one of you with my bare hands—or AT LEAST kill every abortion doctor.

* * *

And I would be saving lives, lives upon lives upon lives and babies upon babies upon babies from termination and torture.

19. A review of additional Medium.com comments by "matthewyesitis Haviland" revealed posts relating to abortion as recently as April 3, 2019, based on their time stamps. Many of the posts are dated "Mar 29," including one that appears directed toward a supporter of abortion rights. That post reads: "What a nice person you are. I would rip your body apart like one of the babies and see if you were so happy about it then." Another March 29 post reads, "If you shooting me in the head were enough to stop abortion worldwide, a thousand times—if I died and came back and you shot me again, a thousand times in a row, and then I stayed dead—I would easily, happily do that to stop abortion."

20. Based on the username, the profile picture, and the content of the posts, I believe that HAVILAND is the user of the "matthewyesitis Haviland" screen name on Medium.com.

Wellness Checks on HAVILAND

21. According to police reports, between June 2018 and the present, police in North Kingstown, Rhode Island have made at least five wellness checks on HAVILAND at the same

residential address in that town. In each instance, the check was at the request of a reporting party concerned about HAVILAND's mental health. According to the reports, those checks occurred on or about the following dates: June 10, 2018; February 5, 2019; April 5, 2019; April 9, 2019; and April 12, 2019.

22. According to police reports, the April 5, 2019 check was prompted by the concerns of Individual 1 and Individual 2. During the check, which occurred during the daytime hours, HAVILAND was made aware of the complaint and concerns regarding his recent text messages and YouTube postings. HAVILAND stated that he was only expressing his political views and has no intention of harming himself or anyone else. He admitted that some of his language had been strong. The police recommended that HAVILAND think about the way his statements would be interpreted by those who read or heard them, and HAVILAND agreed that he would.

23. During the check of HAVILAND on April 12, 2019, the responding officer reported that HAVILAND did not appear to pose a threat to himself or others. Notwithstanding that assessment, I am aware that persons close to HAVILAND have expressed concern about his increasingly extreme statements over the last year, and both they and Victim 1 have expressed concern that HAVILAND might harm someone. Based on my training and experience, and information provided from others in the JTTF, I believe that people who make statements like HAVILAND's are difficult to deter and can quickly escalate to increased harassment or violence.

Conclusion

24. Based on the facts described above and my experience and training, I have probable cause to believe, and do in fact believe, that HAVILAND (1) did with the intent to kill, injure, harass, and intimidate another person, use an electronic communication service of

interstate commerce to engage in a course of conduct that placed Victim 1 in reasonable fear of death or serious bodily injury, in violation of 18 U.S.C. § 2261A(2); and (2) did transmit in interstate commerce communications containing threats to injure the person of another, in violation of 18 U.S.C. § 875(c).


Richard C. Laft, Jr.
FBI Task Force Officer

Subscribed and sworn to before me on April 23, 2019.


Hon. Jennifer C. Boal
United States Magistrate Judge

